

17. APPLICATION AND RIGHT OF WAY OCCUPANCY LICENSE (Form RW-1) - EXAMPLE

This is two-part form used to request access to BellSouth right of way. In addition, the form is used to advise Licensee of BellSouth's approval of the Licensee's application.

The location description on page 2 of the form must be completed, and Form NT-1 must be submitted in conjunction with the application.

FORM HEADING	INSTRUCTIONS
1. Licensee Tracking No.	Licensee inserts tracking number assigned by the Licensee for its internal monitoring.
2. BST Tracking (SAM) No.	BellSouth SPOC inserts tracking number assigned by BellSouth. This number will be used throughout the inquiry, application, and billing process to identify the request.
3. Date Submitted:	Licensee completes date that request is submitted.
4. Licensee Agreement Number:	Licensee inserts Licensee Agreement Number assigned to the agreement by BellSouth.
5. Authorized Licensee Representative:	Licensee inserts name of person authorized to act on its behalf.
6. Company Making Application:	Licensee completes full corporate name of Licensee making application.
7. Telephone:	Licensee inserts contact number for Licensee's authorized representative.
8. Fax:	Licensee inserts its fax number.
9. Street Address:	Licensee inserts street address of business location of Licensee making application.
10. City:	Licensee completes City of business location of Licensee making application.
11. State:	Licensee completes State of business location for Licensee making application.
12. Zip:	Licensee completes Zip Code for business location of Licensee making application.

Continued on next page.

**APPLICATION AND
RIGHT OF WAY
OCCUPANCY LICENSE
(Form RW-1) -
EXAMPLE - Continued**

Continued from previous page.

In accordance with the terms and conditions of the Agreement between us, application is hereby made for a license to occupy BellSouth's right of way as indicated below. This request will be designated:	
13. Licensee RIGHT OF WAY OCCUPANCY (R.O.) Application No. R.O.:	Licensee identifies the sequence number for its application. Individual applications are to be numbered in sequential ascending order by Licensee. BellSouth will process applications in sequential ascending order according to the application numbers assigned by the Licensee.
14.A. Linear Feet:	Licensee indicates the total linear feet of right of way it wishes to occupy.
14.B. Area:	Licensee specifies the area in acres or square feet that it wishes to occupy.
15. Approximate Location (city/district):	Licensee identifies where the proposed occupancy is located. A more detailed description is required on Page 2 of Form RW-1.
Step 1 - Licensee Submittal. Licensee to submit after appropriate forms regarding pre-license surveys, make-ready requests, etc., have been approved. Make-ready work must be completed and notification received prior to application approval	
16. Licensee Representative:	Licensee provides the name of its representative.
17. Title:	Licensee completes title of its representative.
18. Telephone:	Licensee inserts contact number for Licensee authorized representatives.
19. Fax:	Licensee inserts fax number.
Note: Upon approval of application by BellSouth and prior to facility placement by Licensee, Licensee must submit Form NT-1 informing BellSouth of proposed facility placement schedule.	

Continued on next page.

**APPLICATION AND
RIGHT OF WAY
OCCUPANCY LICENSE
(Form RW-1) -
EXAMPLE - Continued**

Sequence Note: After completing form through Item 19, Licensee submits Form RW-1 to BellSouth SPOC (CSPC). BellSouth completes Items 20 through 28 and responds to Licensee.

Step 2 - BellSouth Approval	
20. Date application received:	BellSouth indicates the date that it receives application.
21. Right of Way Occupancy Application...	BellSouth either approves, approves with revisions, or denies the right of way occupancy application.
22. Approved By:	BellSouth inserts printed name of person approving Licensee's application.
23. Signature:	BellSouth inserts signature of its representative reviewing application.
24. Title:	BellSouth inserts the title of its representative reviewing the application.
25. Date Approved:	BellSouth inserts the date that the application is approved.
26. Local BellSouth Contact:	BellSouth completes the name of its local contact person.
27. Telephone:	BellSouth inserts the contact number for its representative.
28. Fax:	BellSouth inserts the fax number for its representative.
29. Linear Feet... Requested:	BellSouth inserts the linear feet or area the Licensee requested to occupy.
30. Linear Feet... Approved:	BellSouth indicates the linear feet or area the Licensee is authorized to occupy.
31. Comments:	BellSouth provides comments, if any.

ATTACHMENT 2

18. FORMS

The following pages contain forms which may be reproduced locally and used when making requests to attach to or occupy BellSouth structures.

Licensees or their representatives having questions on how to complete any of the forms contained in these guidelines should contact the Competitive Structures Provisioning Center.

BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH CHECKLIST ITEM 3: POLES, DUCTS, CONDUITS, AND RIGHTS-OF-WAY

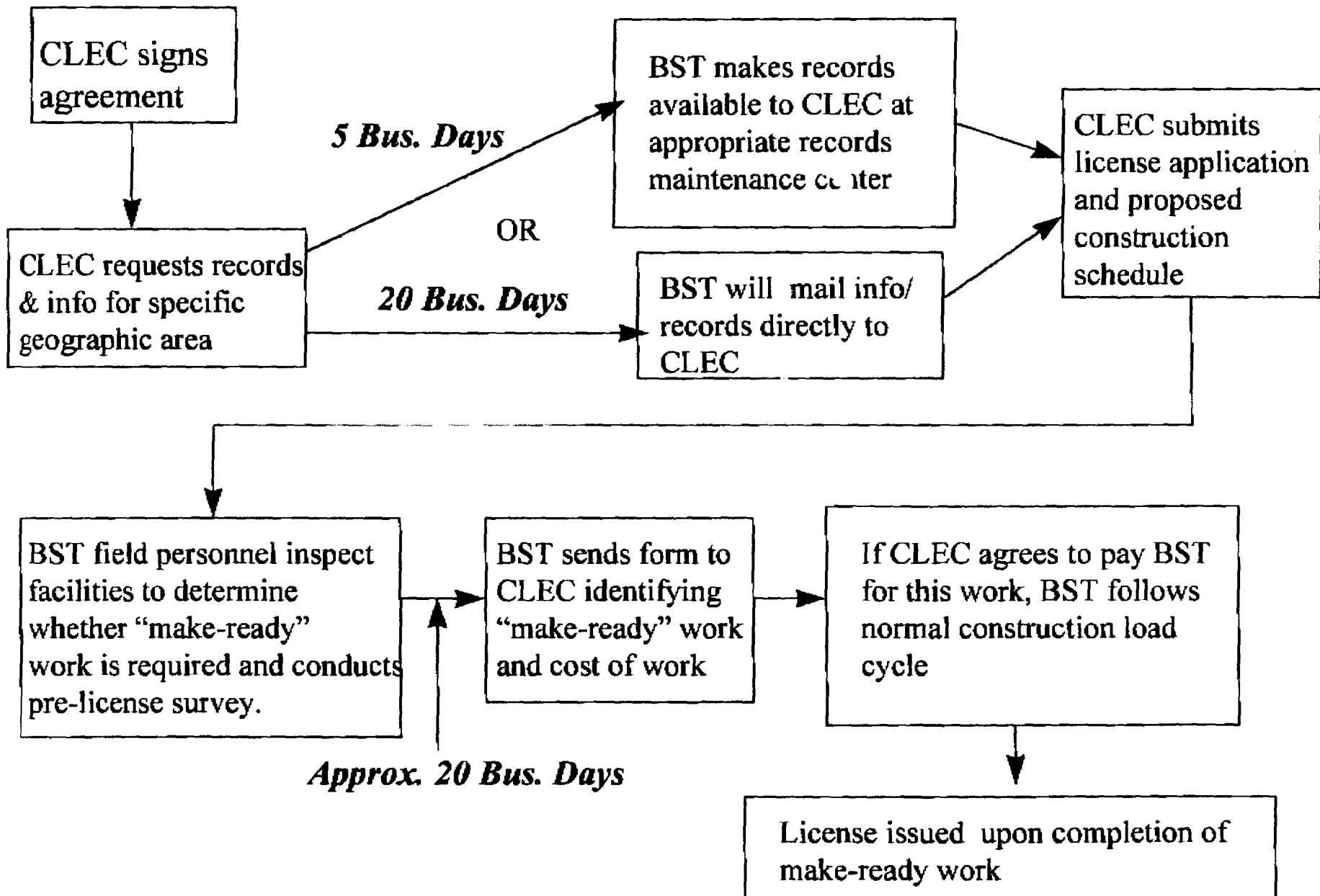
- BellSouth provides access to poles, ducts, conduits and rights of way under standard license agreements pursuant to section 224.
- BellSouth provides access to engineering records that guide CLECs seeking access to BellSouth's poles, ducts, conduits, and rights-of-way.
- BellSouth processes requests for access on a first-come, first-served basis. A CLEC has one year from the issuance of a license to occupy space. BellSouth does not reserve space for its own future business needs.
- No rental fee is charged to the CLEC until the license is issued. Charges commence on the first day of the calendar month following the issuance of the license. There is a one-month minimum charge.
- The CLEC pays for all "make-ready" work undertaken by BellSouth to prepare BellSouth's conduit systems, poles, or anchors and related facilities for the requested occupancy or attachment of the CLEC's facilities.
 - Make-ready work includes clearing obstructions, rearrangement and transfer, replacement, or removal of existing facilities, and repair, enlargement, or modification of BellSouth's facilities. BellSouth does not charge for any such changes that are effected to meet BellSouth's, rather than the CLEC's, needs.
 - To the extent that parties other than BellSouth are required to perform "make-ready" work, because they have facilities in the conduit in question, the relevant parties will have to work together to ensure timely completion of all necessary work.
- BellSouth's rates are based on the FCC's formula unless a CLEC negotiates different rates or the state commission establishes different rates.
- The time needed to negotiate and implement access to BellSouth's poles, ducts, conduits, and rights-of-way varies, depending upon the CLEC's specific needs and the work that is required to satisfy those needs:
 - Once a CLEC signs an agreement, the CLEC is responsible for requesting the records to determine whether facilities are available for lease.
 - BellSouth mails its operational guidelines to CLECs with copies of the agreement for signature. BellSouth will make records available for CLECs within five business days of a request at the appropriate record

maintenance center or, at the CLEC's option, will mail the information directly to the CLEC within twenty business days.

- The CLEC then submits a license application, together with a proposed construction schedule.
 - The CLEC may contract with BellSouth for a BellSouth-certified contractor to perform the make-ready work.
 - If the CLEC contracts with BellSouth to perform the make-ready work, BellSouth will follow its normal construction timeframe.
-
- CLECs are responsible for maintenance of and any work required with respect to facilities attached to or placed in BellSouth's conduit, duct space, or pole attachments. BellSouth has no maintenance obligations for CLECs' facilities.
 - While BellSouth requires 48 hours notice from CLECs for access to manholes under normal conditions for investigating facilities, a shorter time frame may be worked out in an emergency.
 - Numerous LECs have negotiated license agreements with BellSouth that allow them to attach their facilities to BellSouth's poles and place their facilities in BellSouth's ducts and conduits.

ATTACHMENT 3

Timeline for Access to Poles, Ducts, Conduit



ATTACHMENT 4

When did BellSouth change the process for access to poles, ducts and conduits from a one step process to a five step process? How much additional time is required to complete the new process vs the old process?

BellSouth has not changed its process for access to poles, ducts and conduits from a one step process to a five step process. In order for BellSouth to meet the requirements of the Act and at the request of some Competitive Local Exchange Carriers ("CLECs"), BellSouth has created a standard process that begins with a single point of contact in the Competitive Structures Provisioning Center ("CSPC"). BellSouth established the CSPC in the summer of 1997. The intent was to meet the statutory obligation to provide uniform and nondiscriminatory treatment of licensees and to assure that multiple applications for the same facilities are processed on a first come, first served basis. Formation of the CSPC does not create any additional work for the CLECs. The same processes, with the exception of a new process to provide records if requested, are still in existence. Some of the request forms for access to facilities may have changed, but the same work content is required.

On January 4, 1993 City Signal, eventually U. S. Signal, signed a License Agreement with BellSouth for the state of Tennessee. When U.S. Signal was acquired by NextLink the License Agreement and the procedures for poles, ducts and conduit remained valid. The contract is still valid today.

Contrary to NextLink's assertion, this agreement does not identify a one step process. Rather, it appears NextLink has been using a process not defined in any license agreement. NextLink has been sending requests directly to the local engineering offices. Under its license agreement, however, NextLink is required to interface with a single point of contact in Nashville, Tennessee, not the local engineering offices. This requirement is virtually identical to the current CSPC approach about which NextLink complains, the only difference being that the single point of contact is now in Birmingham, Alabama rather than Nashville. In addition, while decentralized processing of attachment licenses may have been workable in the pre-Telecommunications Act environment, this approach is impractical for the increased number of applicants seeking access to BellSouth poles and conduit. Only through use of a centralized processing point can BellSouth provide the administrative oversight necessary to assure fair and expedient consideration of all attachment requests, whether submitted by NextLink or another provider.

As for the alleged five step process, BellSouth's standard license agreement establishes procedures for such matters as obtaining access to outside plant records, submitting the license application and proposed construction schedule, requesting a field survey of facilities, requesting an estimate of make-ready work, contracting for the make-ready work to be done, etc. While not all of these steps

are mandatory (e.g., a CLEC is not required to request records and the CLEC may elect to employ a BellSouth-certified contractor to perform certain make-ready work), all are processes a CLEC might wish to employ in designing its network, and all are described in some detail in both the existing agreement under which NextLink is operating and BST's new standard agreement.

With respect to time lines, completion intervals for records access have been standardized. However, for most processes, time lines will depend upon several variables. Some examples of these variables include the complexity of the request, number of poles or feet of conduit involved, etc. These same work processes were required in the old license agreements as well.

NextLink and BellSouth are currently in the process of negotiating a new license agreement and have reached accord on a number of issues. BellSouth remains committed to an environment where attaching entities have enforceable rights, where the interests of pole owners are recognized, and where both parties can negotiate for pole attachment terms and conditions.

ATTACHMENT 5

Charges for combining a single loop and port using collocation in Louisiana

Physical Collocation

Assumptions:

- A non-enclosed area has been requested vs. an equipment enclosure
- Collocator is only placing DS0 level frames in the arrangement
 - A standard 7ft. rack occupies 3 sq. ft. of floor space and can support 1535 terminations which allow 767 loop/port combinations
- A power upgrade is not required
- There are several collocators in the office which reduces the per sq. ft. Space Preparation cost for each collocator
 - Space Prep is estimated to be \$250 per square foot
- Floor space is calculated as the shadow print times a factor of 2.5
- The CLECs cost for supplying the rack and DS0 frames is not included
- CLEC uses hard-wired frames which makes the coordination charge unnecessary
- All orders for service are placed near the beginning of the 7 year period

Number of DS0s per arrangement:	1200
Number of Racks Required:	1.563
Number of Racks Installed:	2
Floor Space Required:	15 square feet
Space Prep is estimated to be	\$250 per square foot
Power Required is	5 Amps
Time CLEC requires to recover upfront costs:	7 years
Time value of money discount percentage:	11.0%

Collocation Costs:

	# units	unit cost	NRC	# units	unit cost	RC/month
Application Fee (per arrangement)	1	\$4,910.00	\$4,910.00			
Space Preparation for 15 square feet*	1	ICB	\$3,750.00			
Enclosure Construction			N/A	0	\$136.63	N/A
Floor Space for 15 square feet			N/A	15	\$4.01	\$60.15
Power for 5 Amps**			N/A	5	\$7.15	\$35.75
Subtotal			\$8,660.00			\$95.90

Loop, Port and Cross-Connect costs:

	# units	unit cost	NRC	# units	unit cost	RC/month
One SL1 2-wire Loop with NID***	1200	\$40.69	\$48,828.00	1200	\$19.35	\$23,220.00
One 2-wire analog port***	1200	\$16.43	\$19,716.00	1200	\$2.20	\$2,640.00
Cross-Connect	2400	\$23.04	\$55,296.00	2400	\$0.26	\$624.00
POT Bay Termination			N/A	2400	\$0.08	\$186.24
Subtotal			\$123,840.00			\$26,670.24
Total Charges		NRC =	\$132,500.00		RC =	\$26,766.14
Grand Total						\$159,266.14

Cost per month for Collocation Non-Recurring charges based upon a payback period of 7 years discounted at 11% is \$146.93 (a)
 Cost per month for Collocation Recurring charges is \$95.90 (b)

Monthly cost per DS0 for Collocation [(a+b)/1200] \$0.20

Cost per month Non-Recurring Loop, Port, and Cross-Connect Charges for 7 years discounted at 11% is \$2,101 (c)
 Cost per month for Recurring Loop, Port, and Cross-Connect Charges is \$26,670 (d)

Monthly cost per DS0 for Loop, Port & Cross-Connect [(c+d)/1200] \$23.98

Total Monthly cost per Loop and Port Combination \$24.18

* Space Preparation is an estimate and may vary for each collocation arrangement

** DC Power may not be necessary

*** Customer place order electronically, port does not include features, usage charges for switching also apply

Charges for combining a single loop and port using collocation in Louisiana

Virtual Collocation

Assumptions:

- Collocator is only placing DS0 level frames in the arrangement
 - A standard 7ft. rack occupies 3 sq. ft. of floor space and can support 1535 terminations which allow 767 loop/port combinations
- A power upgrade is not required
- The CLECs cost for supplying the rack and DS0 frames is not included
- CLEC uses hard-wired frames which makes the coordination charge unnecessary
- All orders for service are placed near the beginning of the 7 year period

Number of DS0s per arrangement:	1200
Number of Racks Required:	1 563
Number of Racks Installed:	2
Floor Space Required:	6 square feet
Power Required is	5 Amps
Time CLEC requires to recover upfront costs:	7 years
Time value of money discount percentage:	11.0%

Collocation Costs:

	# units	unit cost	NRC	# units	unit cost	RC/month
Application Fee (per arrangement)	1	\$2,517.00	\$2,517.00			N/A
Space Preparation			N/A			N/A
Enclosure Construction			N/A			N/A
Floor Space (per sq. ft.)			N/A	6	\$3.20	\$19.20
Power (per amp)*			N/A	5	\$3.48	\$17.40
Subtotal			\$2,517.00			\$36.60

Loop, Port and Cross-Connect costs:

	# units	unit cost	NRC	# units	unit cost	RC/month
One SL1 2-wire Loop with NID**	1200	\$40.69	\$48,828.00	1200	\$19.35	\$23,220.00
One 2-wire analog port**	1200	\$16.43	\$19,716.00	1200	\$2.20	\$2,640.00
Cross-Connect	2400	\$23.04	\$55,296.00	2400	\$0.08	\$192.00
POT Bay Termination			N/A			N/A
Subtotal			\$123,840.00			\$26,052.00
Total Charges			NRC = \$126,357.00			RC = \$26,088.60
Grand Total						<u>\$152,445.60</u>

Cost per month for Collocation Non-Recurring charges based upon a payback period of 7 years discounted at 11% is \$42.71 (a)
 Cost per month for Collocation Recurring charges is \$36.60 (b)

Monthly cost per DS0 for Collocation [(a+b)/1200] \$0.07

Cost per month Non-Recurring Loop, Port, and Cross-Connect Charges for 7 years discounted at 11% is \$2,101 (c)
 Cost per month for Recurring Loop, Port, and Cross-Connect Charges is \$26,089 (d)

Monthly cost per DS0 for Loop, Port & Cross-Connect [(c+d)/1200] \$23.49

Total Monthly cost per Loop and Port Combination \$23.56

* DC Power may not be necessary

** Customer place order electronically, port does not include features, usage charges for switching also apply

ATTACHMENT 6

**BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH
CHECKLIST ITEM 8: WHITE PAGES DIRECTORY LISTINGS**

- BellSouth's state-approved agreements with resellers and facilities-based carriers include arrangements for the provision of White Pages listings for customers of CLECs.
- In each state where the relevant state commission has approved BellSouth's Statement of Generally Available Terms and Conditions ("Statement"), or allowed it to take effect, CLECs also can obtain listings for their subscribers under the terms of the Statement.
- In its agreements and Statement, BellSouth makes available the following items:
 - BellSouth provides subscriber primary listing information in the White Pages in standard format at no charge to the CLEC or its customer.
 - CLEC subscribers are not separately classified or otherwise identified as such. Their listings are included in the same font and size as BellSouth's customers, and without any distinguishing characteristics. Indeed, it is impossible to distinguish BellSouth customers from CLEC customers simply by examining a directory.
 - Additional and optional listings are available at rates set out in BellSouth's General Subscriber Services Tariff. If these services are being resold, the state-established wholesale discount applies.
 - BellSouth updates customers' listings based on information submitted by CLECs in standard format.
 - BellSouth omits subscribers that the CLEC indicates are to be unlisted and accords the directory listings of CLEC subscribers the same confidentiality as listings of BellSouth's own subscribers.
 - BellSouth includes and maintains CLEC subscriber listings in BellSouth's directory assistance database free of charge.
 - BellSouth delivers copies of the White Pages to CLEC subscribers free of charge.
- BellSouth Advertising & Publishing Corporation (BAPCO) publishes 510 different directory titles at an accuracy rate of 99.99 percent. Of 19,359,685 listings, there were 468 claimed errors, which turned out to represent only 138 true errors. The accuracy rate for is currently comparable to, or better than, that of BellSouth's own subscribers.

- BellSouth handles CLEC listings precisely the way it handles its own. There is no reason to believe that a customer of either BellSouth or a CLEC will be deleted from a directory without a disconnect order.
- BellSouth has instituted a "Change Order" process for all new CLEC reseller accounts. Using this approach, the listing is never actually deleted from the database, but rather a change in billing responsibility is assigned to that particular account choosing to switch from BellSouth to another CLEC. For facilities-based carriers the account is first disconnected from BellSouth and then reconnected with the facility provider. Both orders are normally handled in tandem to assure a seamless transaction.
- When a CLEC chooses to switch the customer as is, meaning that the listing and all phone features remain the same, the only change is the customer is now with a new carrier. In these situations, (which represent more than 85% of facilities-based customers), the customer's listing is untouched and remains as it has been since establishment. In those instances where a listing change is requested, a simple form is used to provide the listing information. On this input form, the listing is entered as the customer desires it to appear in the directory.
- BellSouth's methods and procedures for listing the subscribers of other local service providers have been in place since March of 1996. As of February, 1998 BellSouth had provided more than 209,500 listings for CLEC customers in its nine-state region. These include: 16,500 in Alabama; 62,000 in Georgia; 52,000 in Florida; 8000 in Kentucky; 16,000 in Louisiana; 4000 in North Carolina; 16,500 in Mississippi; 15,500 in South Carolina; and 19,000 in Tennessee.
- BellSouth is aware of one incident in which a CLEC subscriber listing was excluded from BellSouth's white page listings because it had mistakenly been excluded from the information downloaded into the BellSouth directory assistance database. That incident occurred in Georgia on or about May 21, 1997, and was corrected when the relevant CLEC notified BellSouth of the problem.
- BellSouth is aware of four other errors that have been reported in CLEC customers' White Pages listings. Further investigation of these incidents revealed that in each case the error arose because the CLEC erred in placing its order (e.g., erroneously stating that a customer's number should be unpublished) or else missed the deadline for placing orders. Liability for any errors or omissions in a directory listing is governed by BellSouth's tariff.
- CLECs can verify the presence of their listings, as well as their listing accuracy, by requesting a Directory Review Listings Report for the book in question, four weeks prior to close of that particular directory. This printout provides a record of

the CLEC listings for that particular directory. In addition, the CLEC receives a Confirmation Order from BellSouth indicating the receipt and processing of the orders sent. This confirmation copy includes the service order number used by BellSouth to process the listing. A CLEC could very easily, by comparing orders sent to Confirmation Orders received, confirm the processing of its listings.

- Wherever BAPCO is responsible for an error, it undertakes to fix the error and ensure it will not reoccur; if the CLEC is responsible, BAPCO provides feedback to ensure the CLEC avoids making the error in the future. A quarterly release is provided to CLECs, which includes instructional information addressing any common CLEC errors.
- Where any local service provider — whether a CLEC or an independent telco — expressly informs BellSouth not to provide its customers listings to other local service providers, BellSouth honors that request. Unless a local service provider has expressly informed BellSouth not to provide its listings, however, BellSouth makes the listings of that local service provider available to CLECs.
- Although it is not required to do so under the checklist or any other provision of the Act, BellSouth includes listings of CLECs' business subscribers in the appropriate Yellow Pages or classified directory.

**BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH
CHECKLIST ITEM 9: ACCESS TO TELEPHONE NUMBERS**

- BellSouth's state-approved agreements obligate BellSouth to provide nondiscriminatory access to number resources.
- In each state where the relevant state commission has approved BellSouth's Statement of Generally Available Terms and Conditions ("Statement"), or allowed it to take effect, CLECs also can obtain number resources via the Statement.
- As the Central Office Code Administrator for its territory, BellSouth has established procedures to provide nondiscriminatory NPA/NXX code assignments to CLECs in accordance with the code administration guidelines published by the Industry Numbering Council, a national industry body.
 - Central Office Code (NXX) Assignment Guidelines, INC 95-0407-008, have been included with BellSouth's section 271 filings to date and will be included as an exhibit with future filings.
- Where an NPA has gone into jeopardy, the BellSouth CO Code Administration Center has implemented processes to comply with consensus decisions of the local industry as expressed in one or more Industry Jeopardy Meetings. In every case to date, the Industry has chosen to ration codes on a first-come, first-served basis. Some carriers, including BellSouth Telecommunications, have been denied an NXX as a result of this rationing during jeopardy.
- As of January 5, 1998, BellSouth had assigned a total of 962 NPA/NXX codes for CLECs. Other than during rationing, BellSouth is not aware of ever having refused a CLEC request for an NPA/NXX code assignment.
- BellSouth does not charge for NXX codes. BellSouth has no plans to charge for activating, disconnecting, or otherwise modifying assigned NXX codes.
- In 1997 BellSouth became aware of a very few instances where an NPA/NXX code assigned to a CLEC was not activated as scheduled in all affected BellSouth switches. To remedy the problem, in mid-1997 BellSouth modified its testing procedures for new NPA/NXX codes. BellSouth has since assigned scores of NPA/NXX codes without any recurrence of the problem.
 - When BellSouth is no longer the Code Administrator, BellSouth will continue to offer services to assist CLECs in obtaining NPA/NXX codes.

- BellSouth has no plans to discontinue any processes associated with activating, disconnecting or otherwise modifying assigned NXXs, whether the Code Holder is BellSouth or another carrier.

**BELLSOUTH'S EVIDENCE OF COMPLIANCE WITH
CHECKLIST ITEM 10: SIGNALING AND CALL-RELATED DATABASES**

- BellSouth's state-approved agreements provide for non-discriminatory access to BellSouth's signaling networks and call-related databases used for call routing and completion.
- In each state where the relevant state commission has approved BellSouth's Statement of Generally Available Terms and Conditions ("Statement"), or allowed it to take effect, CLECs also can obtain access to BellSouth's signaling networks and call-related databases via Section X of the Statement. Further details on access to signaling and call-related databases are provided, moreover, in BellSouth's Local Interconnection and Facility Based Ordering Guide.
- Signaling. CLECs throughout BellSouth's region have access to BellSouth's signaling systems.
 - Signaling Links are dedicated transmission paths carrying signaling messages between switches and signaling networks. Signaling Link Transport is a set of two or four dedicated 56 kbps transmission paths between CLEC-designated Signaling Points of Interconnection and a BellSouth Signal Transfer Point ("STP") site. BellSouth offers 56 kbps connections between a switch or Service Switching Point and a home STP, or between STPs in different company networks (for example, between two STP pairs for two CLECs).
 - Signal Transfer Points are signaling message switches that interconnect Signaling Links to route signaling messages between switches and databases. CLECs may use BellSouth's Signaling System 7 ("SS7") signaling network for signaling between their switches, between their switches and BellSouth's switches, and between their switches and the networks of other parties connected to the BellSouth SS7 network. STPs also provide access to other network elements connected to the BellSouth SS7 network including: 1) BellSouth-provided local switching or tandem switching; 2) BellSouth-provided Service Control Points/databases; 3) third-party provided local switching or tandem switching; and 4) third-party provided Service Control Points/databases.
 - CLECs may use either Feature Group D or SS7 signaling for interconnecting with BellSouth's network. While MCI has argued that BellSouth does not provide CLECs with the use of BellSouth's SS7 network in conjunction with the service called Automatic Call Return, Automatic Call Return does not use or require SS7 functionality. Instead, Automatic Call Return is a switch-based service: the switch temporarily stores the Automatic Number Identification (ANI) information of the calling customer. If the called customer invokes the use of Automatic Call

Return, the switch completes the call by referring to the information stored in its memory of the calling customer's telephone number, rather than through the use of some external database. Thus, SS7 functionality is not required for Automatic Call Return feature to operate properly, either for a CLEC's end user customer or for a BellSouth end user customer.

- As of January 1, 1998, six facilities-based CLECs had interconnected through an interexchange carrier connected to BellSouth and another ten had interconnected by using a third-party signaling hub provider which in turn accesses BellSouth's signaling network. Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Assuming the appropriate signaling links are in place, direct access to the database can be provided as determined through negotiations. Because BellSouth's switch or STP does not distinguish between BellSouth's end users and the end users of resellers, BellSouth does not know how many queries have been made to BellSouth's databases from the end-user customers of resellers.
- The Signaling Link between the CLEC's switch and BellSouth's STP is a complex unbundled network element that CLECs can order by contacting their assigned account team representative at BellSouth. The representative then arranges the set-up for the CLEC.
- BellSouth did not test its signaling service, which allows a CLEC's end user to connect to anyone in BellSouth's region and, through other signaling hub providers, to the world-wide telecommunications network. Such testing was not feasible for several reasons, including the fact that BellSouth's existing signaling network is a real time network that cannot be used to simulate testing without the risk of service disruption.
- Databases. Service Control Points ("SCPs") are databases containing customer and/or carrier-specific routing, billing, or service instructions. These SCPs are the network elements that provide the functionality for storage of, access to, and manipulation of information required to offer a particular service and/or capability. CLECs can access SCPs remotely, by dialing-up BellSouth's Advanced Intelligent Network ("AIN") Service Management System. BellSouth's databases include:
 - Line Information Data Base ("LIDB"). LIDB is a transaction-oriented database accessible through the SS7 network that contains records associated with subscriber line numbers and special billing numbers. LIDB accepts and responds to queries from other BellSouth network elements or a CLEC's alternative network.
 - From January through December 1997, CLECs and other service providers across BellSouth's nine-state region completed

approximately 448 million queries to BellSouth's LIDB. Access to the database was through a third party "signaling hub" provider that was directly connected to BellSouth's signaling network or through an interexchange carrier that was directly connected to BellSouth's signaling network. LIDB queries are billed to the third party "signaling hub" provider or interexchange carrier, not the CLEC. Accordingly, of the 448 million queries completed, BellSouth cannot separate out the number completed by facilities-based CLECs. Facilities-based CLECs can, however, obtain direct access to the database as described in BellSouth's tariff (FCC No. 1). Assuming the appropriate signaling links are in place, direct access to the database can be provided as determined through negotiations.

- Because BellSouth has offered access to its LIDB for many years, BellSouth did not conduct end-to-end testing of this service.
- Toll Free Number Database. The toll free number database provides functionality necessary for toll free (for example, 800 and 888) number services.
 - From January through November 1997, CLECs and other service providers across BellSouth's nine-state region completed approximately 65 million queries to BellSouth's Toll Free Number database. Facilities-based CLECs alone completed 1.6 million queries (BellSouth cannot distinguish between queries from its own end users and the end-user customers of resellers.) Additional facilities-based CLECs may obtain access to the database as described in BellSouth's tariff (FCC No. 1). Assuming the appropriate signaling links are in place, direct access to the database can be provided as determined through negotiations.
 - Because BellSouth has offered access to its 800 database for many years, BellSouth did not conduct end-to-end testing of this service.
- Automatic Location Identification/Data Management System ("ALI/DMS"). The ALI/DMS database contains subscriber information used for determining to which Public Safety Answering Point ("PSAP") an emergency call should be routed.
- Advanced Intelligent Network. AIN is a vendor-independent network architecture deployed by BellSouth that provides capabilities for creation of custom telecommunications services that are invoked by SS7 messages

(called switch "triggers") from a switch to an SCP. AIN access provides CLECs the ability to create service applications utilizing BellSouth AIN and deploy those applications via the BellSouth Service Management System ("SMS") to BellSouth's SCPs. A CLEC that wishes to access BellSouth's AIN for the first time can do so in a matter of seven days provided that the CLEC has the appropriate customer premises facilities installed, i.e., ISDN and PC software.

- BellSouth provides access to its AIN SCP, or databases, through its AIN Toolkit and AIN SMS Access services. These services permit the CLEC to create and deploy AIN services on a BellSouth SCP using a set of service creation tools provided by BellSouth. BellSouth uses these same tools to create and deploy AIN services in exactly the same manner as is available to CLECs.
- BellSouth has tested its AIN Toolkit 1.0, which provides a CLEC with the ability to create and offer AIN-service applications to their end users, as well as its AIN SMS Access 1.0, which provides a CLEC with access to the BellSouth-provided service creation environment. The completion of test calls and the generation of billing records were part of the testing process. The testing confirmed that service orders flowed through BellSouth's systems properly and that accurate bills were rendered.
- BellSouth has made presentations to several CLECs interested in using AIN Toolkit 1.0 to develop AIN applications that would run via BellSouth's AIN, and thus on BellSouth's switches. No CLEC is currently using AIN Toolkit in this manner. Also, no CLEC has yet requested the ability to use AIN Toolkit 1.0 to develop AIN applications that would run via BellSouth's AIN in conjunction with the CLEC's own switches.
- BellSouth provides access to the SMS associated with each of the databases described above in accordance with 47 C.F.R. § 51.319(e)(3). Requesting carriers are provided with the information necessary to format data and enter it into the various databases using the associated SMS. BellSouth also provides interested CLECs with technical service descriptions for each of the above items.
- BellSouth allows access between the CLEC's SCP and BellSouth's signaling network. Appropriate mediation devices will be used as required and as ordered by state commissions to safeguard network security.
- All data in the above databases are maintained in accordance with § 222 of the Act.